Mr. Garrett Clemons
TransMontaigne, Inc.
P. O. Box 5660
Denver, CO 80217

Re: 089-15622
Second Administrative Amendment to
FESOP 089-12853-00001

Dear Mr. Clemons:

TransMontaigne, Inc., formerly known as TransMontaigne Pipeline, Inc., was issued a FESOP on January 4, 2001 for stationary groundwater remediation and product recovery system. A letter requesting an administrative amendment was received on May 10, 2002. The changes are related to the replacement of the catalytic oxidizer at the remediation site with a new oxidizer that can operate in either catalytic or thermal mode, which has an overall efficiency of greater than 98% at the minimum operating temperature of 1400 ^{0}F. The replacement of the catalytic oxidizer with the new catalytic/thermal oxidizer will not affect any of the FESOP limits for criteria pollutants. According to 326 IAC 2-8-10(a)(13), a FESOP administrative amendment can be used for a change that "incorporates a modification of an existing source if the modification will replace or repair a part or piece of equipment in an existing process unless the modification: (A) results in the replacement or repair of an entire process; (B) qualifies as a reconstruction of an entire process; (C) may result in an increase of actual emissions". The change requested meets the above requirements, therefore, pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

(1) The facility description in Section A.2 is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary groundwater remediation and product recovery system consists of the following emission units and pollution control devices:

(a) Air/fluid separator, where vapors separated off influent fluid stream is controlled by a ~~catalytic oxidizer (CATOX), stack ID CAT~~ **catalytic/thermal oxidizer, stack ID THERMCAT**.

(b) Air stripper, where the groundwater exiting the oil/water separator is pumped for Volatile Organic Compounds (VOC) removal, with a water flow rate of 25 gallons per minute. (gpm). The VOC emitted from this process is not ducted through the catalytic**/thermal** oxidizer.

(2) The description of insignificant activities in Section A.3 is amended as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) aboveground storage tank (PST), which has a capacity of 5182 gallons. This is where the product recovered is stored for transport to TransMontaigne Pipeline for reuse.

(b) Oil/water separator (OWS), which has a capacity of 574 gallons. This process involves further separation of the recovered fluid (water and product).

(c) Equalization tank (EQT), which has a capacity of 147 gallons. Tank control surge from the oi/water separator to the air stripper.

(d) ~~CATOX~~ **THERMCAT** natural gas fired burner, with a capacity of ~~0.75~~ **1.50** million British Thermal Units per hour (mmBtu/hr). This burner is used to heat up the catalyst in the catalytic**/thermal** oxidizer.

(3) The facility description in Section D.1 is amended as follows:

Facility Description [326 IAC 2-8-4(10)]:

(a) Air/fluid separator, where vapors separated off influent fluid stream is controlled by a ~~catalytic oxidizer (CATOX), stack ID CAT~~ **catalytic/thermal oxidizer, stack ID THERMCAT**.

(4) Condition D.1.1 is amended as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC2-8], [326 IAC 2-3]

Pursuant to 326 IAC 2-8, the following facilities shall be limited as follows:

(a) ...

(c) Compliance with Condition (a) and (b) of this condition together with the operation of the catalytic/**thermal** oxidizer at an overall efficiency of 98% (percent) shall make 326 IAC 2-7 (Part 70 Permit), 326 IAC 2-3 (Emission Offset) rules not applicable.

(5) Condition D.1.2 is amended as follows:

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

(a) Pursuant to 326 IAC 2-8, the worst single HAP concentration before control, which in this case is Benzene shall be limited to 47.8 mg/l. This limit is required to limit the potential to emit of single HAP to less than 10 tons per 12 consecutive month period, rolled on a monthly basis. Compliance with this limit together with the operation of the catalytic/**thermal** oxidizer at an overall efficiency of 98% (percent) shall make 326 IAC 2-7 (Part 70 Permit) and 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.

(6) Condition D.1.4 is amended as follows:

D.1.4 Catalytic**/Thermal** Oxidizer

The catalytic**/thermal** oxidizer shall be in operation at all times the SVE-Air/Fluid Separator is in operation.

(7) Condition D.1.5 is amended as follows:

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) …

(b) Compliance stack test shall also be determined on the SVE system catalytic**/thermal** oxidizer to verify the minimum catalyst temperature of 700 ^{0}F that will achieve an overall control of 98%. The catalytic oxidizer test shall be repeated at least once every five (5) years.

(8) Condition D.1.6 is amended as follows:

D.1.6 Catalytic**/Thermal** Oxidizer Operating Parameters

The catalytic**/thermal** oxidizer shall maintain a minimum catalyst temperature of 700 ^{o}F or a minimum temperature determined in the most recent compliance tests to maintain at least 98% destruction of the vapor collected, that is necessary to achieve compliance with the VOC and HAP emission limits in Conditions D.1.1 and D.1.2. The operating temperature of the catalyst of the catalytic/**thermal** oxidizer shall be continuously monitored and recorded whenever it is operating.

(9) Condition D.1.7 is amended as follows:

D.1.7 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be sufficient to establish compliance with the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2.

(1) A log of the vapor and HAP concentration test results from the SVE System made monthly.

(2) Continuous recorder operating temperature readings from the catalytic**/thermal** oxidizer.

(10) References to the Office of Air Management (OAM) have been changed to the Office of Air Quality (OAQ).

(11) The Table of Contents is amended as follows:

Compliance Determination Requirements
D.1.4 Catalytic**/Thermal** Oxidizer
D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
D.1.6 Catalytic**/Thermal** Oxidizer Operating Parameters

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]
D.1.7 Record Keeping Requirements

(12) The company name is changed from TransMontaigne Pipeline, Inc. to TransMontaigne, Inc.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Ramesh Tejuja
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) and NEW SOURCE REVIEW

OFFICE OF AIR QUALITY

TransMontaigne, Inc.
SE 1/4, Section 12, Township 35N, Range 15E
Dyer, Indiana

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: NSR/FESOP 089-12853-00001	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: January 4, 2001 Expiration Date: January 4, 2006

First Administrative Amendment No. 089-15047 Issuance Date: Oct 25, 2001

Second Administrative Amendment No. 089-15622	Pages Modified: 3, 4, 5, 24, 25
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary groundwater remediation and product recovery system, which has a recovery flow rate of 20 gallons per minute (gpm), and a maximum air flow rate of 1200 actual cubic feet per minute (acfm).

Authorized individual:	Garrett Clemons		
Source Address:	SE 1/4, Section 12, Township 35N, Range 15E, Dyer, Indiana		
Mailing Address:	P.O. Box 5660, Denver, Colorado 80217		
Source Location Status:	Lake County		
County Status:	Ozone	-	Severe nonattainment
	SO_2	-	An area bounded on the north by Lake Michigan, on the west by the Indiana-Illinois State line, on the south by U.S. 30 from the State line to the intersection of I-65 then following I-65 to the intersection of I-94 then following I-94 to the Lake-Porter County line, & on the east by the Lake-Porter County line is nonattainment and the remainder of Lake County is attainment.
	CO	-	Attainment
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act		

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary groundwater remediation and product recovery system consists of the following emission units and pollution control devices:

(a) Air/fluid separator, where vapors separated off influent fluid stream is controlled by a catalytic/thermal oxidizer, stack ID THERMCAT.

(b) Air stripper, where the groundwater exiting the oil/water separator is pumped for Volatile Organic Compounds (VOC) removal, with a water flow rate of 25 gallons per minute. (gpm).

The VOC emitted from this process is not ducted through the catalytic/thermal oxidizer.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) aboveground storage tank (PST), which has a capacity of 5182 gallons. This is where the product recovered is stored for transport to TransMontaigne Pipeline for reuse.

(b) Oil/water separator (OWS), which has a capacity of 574 gallons. This process involves further separation of the recovered fluid (water and product).

(c) Equalization tank (EQT), which has a capacity of 147 gallons. Tank control surge from the oi/water separator to the air stripper.

(d) THERMCAT natural gas fired burner, with a capacity of 1.5 million British Thermal Units per hour (mmBtu/hr). This burner is used to heat up the catalyst in the catalytic/thermal oxidizer.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) Air/fluid separator, where vapors separated off influent fluid stream is controlled by a catalytic/thermal oxidizer, stack ID THERMCAT.

(b) Air stripper, where the groundwater exiting the oil/water separator is pumped for Volatile Organic Compounds (VOC) removal, with a water flow rate of 25 gallons per minute.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC2-8], [326 IAC 2-3]

(a) Pursuant to 326 IAC 2-8, the following facilities shall be limited as follows:

Facility/Process	Exhaust Gas Concentration Limit Before Control
SVE -Soil Vapor Extraction System	109 milligrams per liter (mg/l)

This exhaust gas concentration limit shall result in the potential to emit of VOC to 20.5 tons per 12 consecutive month period, rolled on a monthly basis.

(b) Any change or exceedance in the exhaust gas concentration of 63,841 micrograms per liter (Fg/liter), which is equivalent to 3.5 tons per year from the air stripper based on the results of the initial concentration test required in Condition D.1.5 shall require revision of this FESOP.

(c) Compliance with Condition (a) and (b) of this condition together with the operation of the catalytic/thermal oxidizer at an overall efficiency of 98% (percent) shall make 326 IAC 2-7 (Part 70 Permit), 326 IAC 2-3 (Emission Offset) rules not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

(a) Pursuant to 326 IAC 2-8, the worst single HAP concentration before control, which in this case is Benzene shall be limited to 47.8 mg/l. This limit is required to limit the potential to emit of single HAP to less than 10 tons per 12 consecutive month period, rolled on a monthly basis. Compliance with this limit together with the operation of the catalytic/thermal oxidizer at an overall efficiency of 98% (percent) shall make 326 IAC 2-7

(Part 70 Permit) and 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.

(b) Compliance with the VOC limit of 20.5 tons per 12 consecutive month period, rolled on a monthly basis in Condition D.1.1(a) and the VOC limit in Condition D.1.1(b), shall also limit the combined HAPs limit, since HAPs are components of the VOC, thus rendering 326 IAC 2-7 (Part 70 Permit) and 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the catalytic/thermal oxidizer.

Compliance Determination Requirements

D.1.4 Catalytic/Thermal Oxidizer

The catalytic/thermal oxidizer shall be in operation at all times the SVE-Air/Fluid Separator is in operation.

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) Compliance tests shall be performed within 30 days after achieving maximum production rate but no later than 90 days after initial start-up. The tests shall include initial vapor concentration from the SVE system, and Air Stripper. The worst single HAP (Benzene) concentration shall also be determined. The vapor and worst HAP (Benzene) concentration tests shall be made once monthly, in lieu of a continuous concentration meter. Only one time concentration test shall be required from the Air Stripper.

(b) Compliance stack test shall also be determined on the SVE system catalytic/thermal oxidizer to verify the minimum catalyst temperature of 700 ^{0}F that will achieve an overall control of 98%. The catalytic/thermal oxidizer test shall be repeated at least once every five (5) years.

(c) The compliance tests in sections (a) and (b) of this condition shall be according to the provisions of 326 IAC 3-6 (Source Sampling Procedure) using the methods specified in the rule or as approved by the Commissioner. The Office of Air Quality (OAQ) and Northwest Indiana Office shall be notified of the actual test date at least two (2) weeks prior to the date, a test protocol shall be submitted to the OAQ, Compliance Data Section and the Northwest Indiana Office, 35 days in advance of the test, and all test reports must be received by the OAQ and Northwest Indiana Office within 45 days of completion of the testing, pursuant to that rule.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Catalytic/Thermal Oxidizer Operating Parameters

The catalytic/thermal oxidizer shall maintain a minimum catalyst temperature of 700 ^{o}F or a minimum temperature determined in the most recent compliance tests to maintain at least 98% destruction of the vapor collected, that is necessary to achieve compliance with the VOC and HAP emission limits in Conditions D.1.1 and D.1.2. The operating temperature of the catalyst of the catalytic/thermal oxidizer shall be continuously monitored and recorded whenever it is operating.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be sufficient to establish compliance with the VOC and HAP emission limits established in

Conditions D.1.1 and D.1.2.

(1) A log of the vapor and HAP concentration test results from the SVE System made monthly.

(2) Continuous recorder operating temperature readings from the catalytic/thermal oxidizer.